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10 *Attorneys for Fire Victim Trustee*

11 **UNITED STATES BANKRUPTCY COURT**  
12 **NORTHERN DISTRICT OF CALIFORNIA**  
13 **SAN FRANCISCO DIVISION**

13 In re:  
14 **PG&E CORPORATION,**  
15 **PACIFIC GAS AND ELECTRIC COMPANY,**  
16 **Debtors.**

16 ☐ Affects PG&E Corporation  
17 ☐ Affects Pacific Gas and Electric Company  
18 ☒ Affects both Debtors

18 *\* All papers shall be filed in the Lead Case,*  
19 *No. 19-30088 (DM).*  
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Case No. 19-30088 (DM)  
Chapter 11  
(Lead Case)  
(Jointly Administered)

**FIRE VICTIM TRUSTEE'S  
STATEMENT OF NON-  
OPPOSITION TO MOTIONS TO  
DEEM LATE-FILED CLAIMS  
TIMELY FOR THE PURPOSE OF  
CLAIM ADMINISTRATION BY  
THE FIRE VICTIM TRUST**

[Relates to Docket Numbers Listed in  
Exhibit A]

1 Cathy Yanni, in her capacity as the Trustee (the “**Trustee**”) of the Fire Victim Trust (the  
2 “**Trust**”), by and through her undersigned counsel and as directed by the *Order Consolidating*  
3 *Motions to File Late Claims* entered August 24, 2022 [Docket No. 12875] (the “**Consolidation**  
4 **Order**”) and the *Order re Supplemental Exhibit to Order Consolidating Motions to File Late*  
5 *Claims* entered September 1, 2022 [Docket No. 12923] (the “**Supplemental Consolidation**  
6 **Order**”), respectfully states as follows:

7 1. The Trust has been monitoring all motions filed with this Court that seek to have  
8 late-filed proofs of claim deemed “timely” for the purpose of having such claims administered by  
9 the Trust.<sup>1</sup>

10 2. In keeping with current Trust policy, the Trust does not oppose any of the motions  
11 seeking to have listed on Exhibit A hereto. Given the number of late claim motions filed in recent  
12 months<sup>2</sup> and the amount of time that has passed since the December 31, 2019 bar date for Fire  
13 Victim Claims and the February 26, 2021 deadline to submit claims questionnaires to the Trust, the  
14 Trustee will be discontinuing the current non-opposition policy with respect to late claim motions  
15 filed after September 30, 2022.

16 3. All claims asserted in connection with the motions listed on Exhibit A are subject to  
17 the requirements of the CRP and are not allowed or approved by the filing of this statement.  
18 Nothing herein shall be construed to be a waiver by the Trust of any right to object to All claims  
19 asserted in connection with the motions listed on Exhibit A on any grounds other than the untimely  
20 filing thereof.

21 4. In compliance with the Consolidation Order and the Supplemental Consolidation  
22 Order, the Trustee has caused to be served and uploaded an order granting the motions listed on  
23 \_\_\_\_\_

24 <sup>1</sup> The Fire Victim Trust Claims Resolution Procedures (“**CRP**”) mandate that claimants must have  
25 timely filed a proof of claim to be eligible to receive compensation from the Trust. See CRP §I.

26 <sup>2</sup> Of the 394 late claim motions filed since the December 31, 2019 extended bar date, 216 have been  
27 filed in the last six months and 161 were filed in August alone. To put these numbers in perspective, in  
28 2020, which included the months immediately after the Extended Bar Date and the effective date of the  
Trust (both events that could be expected to prompt the filing of late claim motions), the total number of late  
claim motions filed alleging Fire Victim Claims was 55. In 2021, the total number was only 22.

1 Exhibit A hereto (the “**Proposed Order**”). A copy of the Proposed Order is attached hereto as  
2 Exhibit B.

3  
4 DATED: September 15, 2022

BROWN RUDNICK LLP

5  
6 By: /s/Eric R. Goodman

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**EXHIBIT A**  
LIST OF UNCONTESTED MOTIONS

# LIST OF UNCONTESTED MOTIONS

DATE MOTION FILED	DOCKET NO.	CLAIMANT(S)	COUNSEL/PRO SE
7-6-2022	12591	Navarro et al	James Frantz
7-6-2022	12592	Raczynski et al	James Frantz
8-16-2022	12706	Hughes et al	Patricia Savage
8-16-2022	12707	Flinn et al	Jacob Faircloth
8-16-2022	12710	Bertolini et al	Jacob Faircloth
8-16-2022	12712	Velasquez et al	Jacob Faircloth
8-16-2022	12714	Mogannam et al	Jacob Faircloth
8-16-2022	12716	McNamee	Jacob Faircloth
8-16-2022	12720	Cattich	Laila Masud
8-16-2022	12722	Chandler et al	Laila Masud
8-16-2022	12724	Elliott et al	Laila Masud
8-16-2022	12727	Fricano et al	Laila Masud
8-16-2022	12729	Ledbetter et al	Laila Masud
8-16-2022	12731	Murray et al	Laila Masud
8-16-2022	12733	Needham et al	Laila Masud
8-16-2022	12735	Rebischeke et al	Laila Masud
8-16-2022	12737	Smith et al	Laila Masud
8-16-2022	12739	Vanarman et al	Laila Masud
8-17-2022	12741	Grange et al	Jacob Faircloth
8-17-2022	12743	Rubio et al	Jacob Faircloth
8-17-2022	12745	Browning et al	Jacob Faircloth
8-17-2022	12748 <i>Amends 12747</i>	Gummer et al	Jacob Faircloth
8-17-2022	12750	Levinson et al	Jacob Faircloth
8-17-2022	12752	Lipman et al	Jacob Faircloth
8-17-2022	12754	Valencia et al	Jacob Faircloth
8-17-2022	12756	Van Giesen	Jacob Faircloth
8-17-2022	12758	Ezekiel et al	Jacob Faircloth
8-17-2022	12760	Wallach	<i>Pro Se</i>
8-17-2022	12762 <i>Duplicates 12761</i>	Lehman	Shounak Dharap
8-18-2022	12764	Vaughn Wright	Emily Levin
8-18-2022	12768	Balbutin-Burnham et al	Emily Levin
8-18-2022	12772	Ruppe et al	Jacob Faircloth
8-22-2022	12779	Efrain Yanez et al	<i>Pro Se</i>
8-22-2022	12782	Bailon	Jacob Faircloth
8-22-2022	12784	Cendejas et al	Jacob Faircloth
8-22-2022	12786	Chiurco	Jacob Faircloth
8-22-2022	12788	Abraham et al	Jacob Faircloth
8-22-2022	12791 <i>Amends 12790</i>	Sandoval-Cottman et al	Jacob Faircloth
8-22-2022	12793	Fitchie et al	Jacob Faircloth
8-22-2022	12795	McMahon et al	Jacob Faircloth

<b>DATE MOTION FILED</b>	<b>DOCKET NO.</b>	<b>CLAIMANT(S)</b>	<b>COUNSEL/PRO SE</b>
8-22-2022	12797	Montano et al	Jacob Faircloth
8-22-2022	12799	Cheney et al	Jacob Faircloth
8-22-2022	12803	Luther et al	<i>Pro Se</i>
8-22-2022	12804	Neff	<i>Pro Se</i>
8-22-2022	12805	Jennifer Miller et al	<i>Pro Se</i>
8-22-2022	12808	Jewel Miller et al	<i>Pro Se</i>
8-23-2022	12806	Moore et al	Jacob Faircloth
8-23-2022	12809	Kulin	Jacob Faircloth
8-23-2022	12811	Larrecou	Jacob Faircloth
8-23-2022	12813	D Martin et al	Jacob Faircloth
8-23-2022	12815	M Martin et al	Jacob Faircloth
8-23-2022	12817	Parker et al	Jacob Faircloth
8-23-2022	12819	Martin et al	Jacob Faircloth
8-23-2022	12822	Smith et al	Jacob Faircloth
8-23-2022	12824	Tedeschi et al	Jacob Faircloth
8-23-2022	12826	Tunev et al	Jacob Faircloth
8-23-2022	12828	Franciosi et al	Laila Masud
8-23-2022	12830	Giboney	Laila Masud
8-23-2022	12832	Brennan et al	Laila Masud
8-23-2022	12835	Edwards et al	Jacob Faircloth
8-24-2022	12837	Ashworth et al	Jacob Faircloth
8-24-2022	12839	Galvan	Jacob Faircloth
8-24-2022	12841	Gilardo	Jacob Faircloth
8-24-2022	12843	Harris	Jacob Faircloth
8-24-2022	12845	Kane et al	Jacob Faircloth
8-24-2022	12847	Krummes et al	Jacob Faircloth
8-24-2022	12849	Luzaich	Jacob Faircloth
8-24-2022	12851	Mool et al	Jacob Faircloth
8-24-2022	12853	Ortiz	Jacob Faircloth
8-24-2022	12855	Panoski et al	Jacob Faircloth
8-24-2022	12857	Ruiz et al	Jacob Faircloth
8-24-2022	12859	Russell	Jacob Faircloth
8-24-2022	12861	Rousset et al	Jacob Faircloth
8-24-2022	12863	Shapero	Jacob Faircloth
8-24-2022	12865	Stocks et al	Jacob Faircloth
8-24-2022	12867	Vazquez et al	Jacob Faircloth
8-24-2022	12870	Kangrga et al	<i>Pro Se</i>
8-25-2022	12876	Carrillo et al	<i>Pro Se</i>
8-30-2022	12892	J. Fife et al	<i>Pro Se</i>
8-30-2022	12893	M. Fife et al	<i>Pro Se</i>
8-30-2022	12895	Smithson et al	<i>Pro Se</i>

**EXHIBIT B**  
**PROPOSED ORDER**

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20 *\* All papers shall be filed in the Lead Case,  
No. 19-30088 (DM).*

Case No. 19-30088 (DM)  
Chapter 11  
(Lead Case)  
(Jointly Administered)

**ORDER GRANTING MOTIONS  
TO DEEM LATE-FILED CLAIMS  
TIMELY FOR THE PURPOSE OF  
CLAIM ADMINISTRATION BY  
THE FIRE VICTIM TRUST**



1 The Court having considered the *Fire Victim Trustee's Statement of Non-Opposition to*  
2 *Motions to Deem Late-Filed Claims Timely for the Purpose of Claim Administration by the Fire*  
3 *Victim Trust* Dated September 15, 2022 [Dkt. No. ] (the "**Trustee Statement**") and the  
4 motions listed in Exhibit A to the Trustee Statement (the "**Late Claim Motions**"), and good  
5 cause appearing,

6 IT IS HEREBY ORDERED THAT:

7 1. The proofs of claim addressed by the Late Claim Motions (the "**Proofs of Claim**")  
8 are deemed timely filed.

9 2. The Proofs of Claims and the claims asserted thereunder (the "**Asserted Fire**  
10 **Victim Claims**") shall for all purposes be treated and classified as Fire Victim Claims under the  
11 Plan, and shall be fully assumed by, and the sole responsibility of, the Fire Victim Trust and subject  
12 to the Channeling Injunction, to be administered, processed, settled, disallowed, resolved,  
13 liquidated, satisfied, and/or paid in accordance with the Fire Victim Trust Agreement and the Fire  
14 Victim Claims Resolution Procedures. Movants shall have no further recourse against the Debtors  
15 or Reorganized Debtors, as applicable, with respect to the Proofs of Claim or the Asserted Fire  
16 Victim Claims.

17 3. Nothing herein shall be construed to be a waiver by the Fire Victim Trust of any  
18 right to object to the Asserted Fire Victim Claims or the Proofs of Claim on any grounds other than  
19 the untimely filing thereof.

20 4. This Court shall retain jurisdiction to resolve any disputes or controversies arising  
21 from the Stipulation or this Order.

22 \*\*\* END OF ORDER \*\*\*

23 Dated: September 15, 2022

24 BROWN RUDNICK LLP

25  
26 /s/Eric R. Goodman

27 Eric R. Goodman

28 *Attorneys for Fire Victim Trustee*